

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA

v.

[1] CHESTER GALLAGHER

[2] HEATHER IDONI

[3] CALVIN ZASTROW

[4] COLEMAN BOYD

[7] DENNIS GREEN

**No. 3:22-CR-00327
JUDGE TRAUGER**

**MOTION REQUESTING LEAVE OF COURT
TO FILE EX PARTE AND SEALED DOCUMENT**

Comes now the Defendant, Chester Gallager, Heather Idoni, Calvin Zastrow, Coleman Boyd and Dennis Green, by and through undersigned CJA appointed counsel, pursuant to Title 18 U.S.C. section 3006A which provides for an *ex parte* application, and hereby requests leave of this Honorable Court to file a sealed motion for this Court's review. Counsel for the above listed Defendants submit that the motion is properly filed under seal and that the law specifically provides that the sealed motion be filed *ex parte*. Counsel further represents to this Court that she **will not serve** a copy of the *under seal* document on the government or codefendant Vaughn's counsel.

Respectfully submitted,

/s/ Jodie A. Bell

JODIE A. BELL, No. 18336
Washington Square Building
214 Second Avenue North, Suite 208
Nashville, Tennessee 37201
(615) 953-4977
(615) 928-1901 facsimile
jodie@attorneyjodiebell.com
Attorney for Chester Gallagher

/s/ William J. Conway (by permission)

William J. Conway, Esq. P.C.
214 Second Avenue North, Suite 208
Nashville, TN 37201
(615) 260-5364
wjconway@gmail.com
Attorney for Defendant Heather Idoni

/s/ Robert L. Parris (by permission)

Robert L. Parris, Attorney at Law
200 Jefferson Avenue, Suite 1500
Memphis, TN 38103
(615) 490-8026
rlp@robertparrisattorney.com
Attorney for Defendant Calvin Zastrow

/s/ Kerry Haymaker (by permission)

Haymaker & Heroux, P.C.
545 Mainstream Drive, Suite 420
Nashville, TN 37228
(615) 250-0050
haymaker@tennesseedefense.com
Attorney for Defendant Coleman Boyd

/s/ Manuel B. Russ (by permission)

MANUEL B. RUSS
340 21st Avenue North
Nashville, TN 37203
(615) 329-1919
russben@gmail.com
Attorney for Defendant Dennis Green

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Motion to Continue was filed electronically and served on the following by the EF/CME electronic filing system:

WILLIAM J. CONWAY

William J. Conway, Esq. P.C.
214 Second Avenue North, Suite 208
Nashville, TN 37201
(615) 260-5364
wjconway@gmail.com
Attorney for Defendant Heather Idoni

ROBERT LYNN PARRIS

Robert L. Parris, Attorney at Law
200 Jefferson Avenue
Suite 1500
Memphis, TN 38103
(615) 490-8026
rlp@robertparrisattorney.com
Attorney for Defendant Calvin Zastrow

G. KERRY HAYMAKER

Haymaker & Heroux, P.C.
545 Mainstream Drive
Suite 420
Nashville, TN 37228
(615) 250-0050
haymaker@tennesseedefense.com
Attorney for Defendant Coleman Boyd

HEATHER G. PARKER

Evans Bulloch Parker PLLC
302 North Spring Street
PO Box 398
Murfreesboro, TN 37133-0398
(615) 896-4154
heatherparker@bfhelaw.com
Attorney for Defendant Caroline Davis

LARRY LAMONT CRAIN

5214 Maryland Way
Suite 402

Brentwood, TN 37207

(615) 376-2600

larry@crainlaw.legal

STEPHEN M. CRAMPTON

Thomas More Society

P.O. Box 4506

Tupelo, MS 38803

662-255-9439

scrampton@thomasmoresociety.org

Attorney for Defendant Paul Vaughn

MANUEL B. RUSS

340 21st Avenue North

Nashville, TN 37203

(615) 329-1919

russben@gmail.com

Attorney for Defendant Dennis Green

DAVID R. HEROUX, P.C.

Haymaker & Heroux, P.C.

545 Mainstream Drive

Suite 420

Nashville, TN 37228

(615) 250-0050

heroux@tennesseedefense.com

Attorney for Defendant Eva Edl

DAVID L. COOPER

Law Office of David L. Cooper, P.C.

208 Third Avenue, N Suite 300

Nashville, TN 37201

(615) 256-1008

dcooper@cooperlawfirm.com

Attorney for Defendant Eva Zastrow

RAYBURN McGOWAN, Jr.

8005 Church Street East

Suite 219

Brentwood, TN 37207

(615) 244-7070

mcgowanrayburnjr@bellsouth.net

Attorney for Defendant James Zastrow

LEONARD E. LUCAS, III

The Law Firm of Leonard Earl Lucas
315 Deadrick St, Suite 1550
Nashville, TN 37238
(301) 204-6498
leonard.lucas@lellawfirm.com
Attorney for Defendant Paul Place

AMANDA J. KLOPF

U.S. Attorney's Office (Nashville)
719 Church Street
Suite 3300
Nashville, TN 37203
(615) 736-5151
amanda.klopf@usdoj.gov
Representing USA (*Plaintiff*)

KYLE BOYNTON

WILFRED T. BEAYE, JR.

Department of Justice
150 M Street NE
Washington, DC 20002
(202) 598-0449
nikhil.ramnaney@usdoj.gov
Representing USA (*Plaintiff*)

This the 8th day of December 2023.

/s/ Jodie A. Bell

JODIE A. BELL